

**Baker & Hostetler LLP**  
45 Rockefeller Plaza  
New York, NY 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Nicholas J. Cremona

*Attorney for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

MBE PREFERRED LIMITED PARTNERSHIP;  
MBE GENERAL LLC as the General Partner of  
MBE Preferred Limited Partnership; KENNETH L.  
EVENSTAD REVOCABLE TRUST u/a/d May 2,  
2000 as a Limited Partner of MBE Preferred  
Limited Partnership; KENNETH L. EVENSTAD  
in his capacity as Grantor and Trustee for the  
Kenneth L. Evenstad Revocable Trust u/a/d May 2,

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04952 (SMB)

2000; GRACE B. EVENSTAD in her capacity as Trustee for the Kenneth L. Evenstad Revocable Trust u/a/d May 2, 2000; KENNETH L. EVENSTAD, individually; GRACE B. EVENSTAD, individually; MARK B. EVENSTAD REVOCABLE TRUST u/a/d January 30, 2003 as a Limited Partner of MBE Preferred Limited Partnership; MARK B. EVENSTAD in his capacity as Grantor and Trustee for the Mark B. Evenstad Revocable Trust u/a/d January 30, 2003; SHANNON MAHONEY EVENSTAD in her capacity as Trustee for the Mark B. Evenstad Revocable Trust u/a/d January 30, 2003; MARK B. EVENSTAD individually; and SHANNON MAHONEY EVENSTAD individually,

Defendants.

**CASE MANAGEMENT NOTICE**

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “Order”) [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

1. The Initial Disclosures shall be due: May 16, 2014
2. Fact Discovery shall be completed by: December 12, 2014
3. The Deadline for Service of Substantive Interrogatories shall be: September 12, 2014
4. The Disclosure of Case-in-Chief Experts shall be due: August 14, 2015
5. The Disclosure of Rebuttal Experts shall be due: September 14, 2015
6. The Deadline for Completion of Expert Discovery shall be: October 13, 2015
7. The Deadline for Service of a Notice of Mediation Referral shall be: On or before December 14, 2015

8. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before December 28, 2015, or within 14 days after the service of the Notice of Mediation Referral, whichever is earlier.

9. The Deadline for Conclusion of Mediation shall be: On or before April 26, 2016, or within 120 days of the date of service of the Notice of Mediator Selection, whichever is earlier.

Dated: March 20, 2014

**BAKER & HOSTETLER LLP**

By: /s/ Nicholas J. Cremona  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: 212.589.4200  
Facsimile: 212.589.4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Marc E. Hirschfield  
Email: mhirschfield@bakerlaw.com  
Nicholas Cremona  
Email: ncremona@bakerlaw.com  
Christa C. Turner  
Email: cturner@bakerlaw.com

*Attorneys for Plaintiff Irving H. Picard,  
Trustee for the Liquidation of Bernard L.  
Madoff Investment Securities LLC*

**LOEB & LOEB, LLP**

By: /s/ Daniel B. Besikof  
345 Park Avenue  
New York, New York 10154  
Telephone: 212.407.4129  
Facsimile: 646.417.6335  
P. Gregory Schwed  
Email: gschwed@loeb.com  
Daniel B. Besikof  
Email: dbesikof@loeb.com

*Attorneys for Defendants*